

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO

UNITED STATES of AMERICA,

Plaintiff,

V.

- [1] Angel Ayala Vazquez, aka, "El Negro, El Buster, Angelo Millones Papa Upa",
- [2] Jose Negron Rivera, aka "Nino Brown",
- [3] Omar Medina Santiago, aka "Omar El Gordo",
- [4] Samuel Negron Hernandez, aka "Sammy Toston",
- [5] Elvin Torres Estrada, aka "Muñecon", "Irvin", "Irving",
- [6] Diego Cardona Vazquez,
- [7] Jose Hernandez Torres, aka "Gringo",
- [8] Luis Xadiel Cruz Vazquez, aka "El Mono",
- [9] Charlie Martinez Baez,
- [10] Efren Sanchez Peña, aka "Papa",
- [11] Jose R. Rosario Oquendo, aka "Checo",
- [12] Felix Chevalier Torres, aka "O'Neil",
- [13] Ramon J. Rosario Oquendo, aka "Raymond",
- [14] Hector Carmona Couvertier, aka "Towa",
- [15] Pedro Juan Diaz, aka "Popo",
- [16] Orlando Ayala Medina, aka "Negrito",
- [17] Alejandro Martinez Baez, aka "Alex Prenda, Alex Fuerte",

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**FIRST SUPERSEDING
INDICTMENT**

CRIMINAL NO. 09-173(PG)

VIOLATIONS:

(COUNT ONE) - Conspiracy to Possess with intent to distribute Controlled Substances

Title 21, U.S.C., Sections 841(a)(1), 846 and 860

(COUNT TWO)- Conspiracy to Import Narcotics into the Customs Territory of the United States

Title 21, U.S.C., Section 963

(COUNT THREE) - Possession with intent to distribute Heroin

Title 21, U.S.C., Sections 841(a)(1) and 860; and Title 18, U.S.C., Section 2

(COUNT FOUR) - Possession with intent to distribute Crack Cocaine

Title 21, U.S.C., Sections 841(a)(1) and 860; and Title 18, U.S.C., Section 2

(COUNT FIVE) - Possession with intent to distribute Cocaine

Title 21, U.S.C., Sections 841(a)(1) and 860; and Title 18, U.S.C., Section 2

(COUNT SIX) - Possession with intent to distribute Marijuana

Title 21, U.S.C., Sections 841(a)(1) and 860; and Title 18, U.S.C., Section 2

(COUNT SEVEN) - Forfeiture

Title 21, U.S.C., Sections 853 and 881; and Title 18 U.S.C. Section 982

(SEVEN COUNTS)

- [18] Jose Badillo Lopez, aka "Jayson",
- [19] Alejandro Santiago Borrero, aka "Manita",
- [20] Lizbeth Caban Olivo, aka "Tita",
- [21] Juanita Rivera Rojas, aka "Moña, Jenny",
- [22] Jose Ortega Sanchez, aka "Chelin",
- [23] Carlos Santiago Agosto, aka "Carlito's Way",
- [24] Luis Pizarro Morales, aka "Prieto",
- [25] Miguel Angel Montes, "Ito",
- [26] Juan Carlos Orsini Martinez, aka "Cano Biombo",
- [27] Aramis Nuñez Aybar "El Negro",
- [28] Jerry Garcia Luna,
- [29] Alexis Cruz Navarro,
- [30] Jose E. Garcia Gascot, aka "Cuello",
- [31] Jayson Serrano Andino, aka "Martillo",
- [32] Jorge Torres Vega, aka "Caneca",
- [33] Fernando Falcon Lopez,
- [34] Leonardo Colon, aka "Puchungo",
- [35] Carlos Torres Pagan,
- [36] Angel Isaac Rosario Oquendo,
- [37] Jose Arce Baez, aka "Joey",
- [38] Julio Martinez Colon, aka "Yuyu",
- [39] Adal Rivera Lopez, aka "Moises",
- [40] Anthony Suarez Guzman,
- [41] Fernando Suarez de Leon, aka "Chucho",
- [42] Eliut Pedroza Gerena,
- [43] Angel Olivo Rivera, aka "Tun Tun",
- [44] Javier Rodriguez Romero, aka

"Panki",
[45] Ernesto Pedroza Gerena,
[46] Jonathan Rivera Romero, aka
"Bebo",
[47] David Diaz Colon,
[48] Angel Santana Altruz, aka "Indio",
[49] Jorge Luis Torres-Nieves, aka
"Georgie Bacalao",
[50] Humberto Cruz-Ortiz, aka
"Masita",
[51] Rafael Santiago Martinez, aka
"Pica",
[52] Edgar Medina Montalvo, aka
"Canito",
[53] Alberto Melendez Saez,
[54] Marva Adorno Molina,
[55] Edwin Vazquez Oliveras, aka
"Edwin El Pato",
[56] Mayra Ivelise Atanacio Ramos,
[57] Jariel Jose Zapata Bonilla, aka
"Menor",
[58] Wilfredo Rivera Vargas , aka
"Monkey",
[59] Maribel Olivo Rivera,
[60] Jose L. Colon Marrero, aka "Papo
El Cojo",
[61] Rafael Rivera Rivera, aka
"Rafaelito",
[62] Erick Suarez Guzman, aka
"Herito",
[63] Alex David Davila Olivo, aka "Alex
Gringo",
[64] Joshua Orta Ramos,
[65] Angel Soto Olivo, aka "Peewee",
Defendants.

THE GRAND JURY CHARGES:

COUNT ONE

Title 21, United States Code, Section 846

(Conspiracy to Possess with Intent to Distribute Controlled Substances)

From in or about the year 1995, and continuing up to and until the return of the instant Indictment, in the District of Puerto Rico, specifically in the Municipality of Bayamon, elsewhere, and within the jurisdiction of this Court,

- [1]Angel Ayala Vazquez, aka, "El Negro, El Buster, Angelo Millones Papa Upa",
 - [2] Jose Negron Rivera, aka "Nino Brown",
 - [3] Omar Medina Santiago, aka "Omar El Gordo",
 - [4] Samuel Negron Hernandez, aka "Sammy Toston",
 - [5] Elvin Torres Estrada, aka "Muñecon", "Irvin", "Irving",
 - [6] Diego Cardona Vazquez,
 - [7] Jose Hernandez Torres, aka "Gringo",
 - [8] Luis X. Cruz Vazquez, aka "El Mono", "Xadiel", "Xadier",
 - [9] Charlie Martinez Baez,
 - [10] Efren Sanchez Peña, aka "Papa",
 - [12] Felix Chevalier Torres, aka "O'Neil",
 - [13] Ramon J. Rosario Oquendo, aka "Raymond",
 - [14] Hector Carmona Couvertier, aka "Towa",
 - [15] Pedro Juan Diaz, aka "Popo",
 - [16] Orlando Ayala, aka "Negrito",
 - [17] Alexandro Martinez Baez, aka "Alex Prenda, Alex Fuerte",
 - [18] Jose Badillo Lopez, aka "Jayson",
 - [19] Alejandro Santiago Borrero, aka "Manita",
 - [20] Lizbeth Caban Olivo, aka "Tita",
 - [21] Juanita Rivera, aka "Moña",
 - [22] Jose Ortega Sanchez, aka "Chelin",

[23] Carlos Santiago Agosto, aka "Carlito's Way",
[24] Luis Pizarro Morales, aka "Prieto",
[25] Miguel Angel Montes, "Ito",
[26] Juan Carlos Orsini Martinez, aka "Cano Biombo",
[27] Aramis Nuñez Aybar,
[28] Jerry Garcia Luna,
[29] Alexis Cruz Navarro,
[30] Jose E. Garcia Gascot, aka "Cuello",
[31] Jayson Serrano Andino, aka "Martillo",
[32] Jorge Torres Vega, aka "Caneca",
[33] Fernando Falcon Lopez,
[34] Leonardo Colon, aka "Puchungo",
[35] Carlos Torres Pagan,
[36] Angel Isaac Rosario Oquendo,
[37] Jose Arce Baez, aka "Joey",
[38] Julio Martinez Colon, aka "Yuyu",
[39] Adal Rivera Lopez, aka "Moises",
[40] Anthony Suarez Guzman,
[41] Fernando Suarez de Leon, aka "Chucho",
[42] Eliut Pedroza Gerena,
[43] Angel Olivo Rivera, aka "Tun Tun",
[44] Javier Rodriguez Romero, aka "Panki",
[45] Ernesto Pedroza Gerena,
[46] Jonathan Rivera Romero, aka "Bebo",
[47] David Diaz Colon,
[48] Angel Santana Altruz, aka "Indio",
[49] Jorge Luis Torres-Nieves, aka "Georgie Bacalao",
[50] Humberto Cruz-Ortiz, aka "Masita",
[51] Rafael Santiago Martinez, aka "Pica",
[52] Edgar Medina Montalvo, aka "Canito",
[53] Alberto Melendez Saez,
[54] Marva Adorno Molina,
[55] Edwin Vazquez Oliveras, aka "Edwin El Pato",

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[56] Mayra Ivelise Atanacio Ramos,
 [57] Jariel Jose Zapata Bonilla, aka "Menor",
 [58] Wilfredo Rivera Vargas , aka "Monkey",
 [59]Maribel Olivo Rivera,
 [60] Jose L. Colon Marrero, aka "Papo El Cojo",
 [61] Rafael Rivera Rivera, aka "Rafaelito",
 [62] Erick Suarez Guzman, aka "Herito",
 [63] Alex David Davila Olivo, aka "Alex Gringo",
 [64] Joshua Orta Ramos,
 [65] Angel Soto Olivo, aka "Peewee",

the defendants herein, did knowingly and intentionally, combine, conspire, and agree with each other and with diverse other persons known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly and intentionally possess with intent to distribute and distribute controlled substances, to wit: in excess of one (1) kilogram of heroin, a Schedule I, Narcotic Drug Controlled Substance; and in excess of fifty (50) grams of cocaine base, a Schedule II Narcotic Drug Controlled Substance; and in excess of five (5) kilograms of cocaine, a Schedule II, Narcotic Drug Controlled Substance; and in excess of one thousand (1000) kilograms of marijuana, a Schedule I, Controlled Substance; and detectable amounts of oxycodone (commonly known as "Percocet"), a Schedule II Controlled Substance; and/or detectable amounts of alprazolam (commonly known as "Xanax"), a Schedule IV Controlled Substance; within one thousand (1,000) feet of the real property comprising a public housing project, as prohibited by Title 21, United States Code, §§ 841(a)(1) and 860.

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GENERAL ALLEGATIONS

1. The Jose Celso Barbosa Public Housing Project (hereinafter "Barbosa") and the Sierra Linda Public Housing Project (hereinafter "Sierra Linda") are Public Housing Projects located in Bayamon, Puerto Rico. Barbosa and Sierra Linda are owned by the Department of Housing and Urban Development, and maintained and operated by the Puerto Rico Housing Department (commonly known in Spanish as "Vivienda").
2. Since the early 1990's there have been numerous drug distribution points (commonly known as "puntos") operating at varying locations in and around Barbosa and Sierra Linda. Since approximately 1995, the drug distribution at Barbosa and Sierra Linda, and the surrounding areas of Bayamon, Puerto Rico, has been controlled by a drug trafficking organization (hereinafter "DTO") headed by **Angel Ayala-Vazquez, aka "Negro"**, **"Buster"**, **"Papa Upa"**, and **"Angelo Millones"**. The DTO often referred to the membership in Spanish as "El Combo de los Setenta" ("The Combo of the Seventy") or "El Combo que no se deja" ("The Combo that does not allow").

OBJECT OF THE CONSPIRACY

The object of the conspiracy was to distribute controlled substances at Public Housing Projects located within Puerto Rico, and to supply controlled substances, all for significant financial gain and profit.

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MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants and their co-conspirators would accomplish and further the object of the conspiracy, among others, included the following:

1. It was part of the manner and means of the conspiracy that defendants and their co-conspirators assumed various roles within the DTO in order to further the object of the conspiracy, including but not limited to: (a) leaders; (b) suppliers; (c) administrators (d) drug point owners; (e) runners; (f) enforcers; (g) sellers; (h) facilitators; and (I) lookouts.
2. It was further a manner and means of the conspiracy that the defendants and their co-conspirators would preserve and protect the power, integrity, territory, reputation and profits of the DTO through the use of intimidation, threatened and actual violence.
3. It was further a manner and means of the conspiracy that the defendants and their co-conspirators would keep DTO customers, potential customers, rival narcotics dealers, law enforcement authorities and community members in fear through the use of violence and threats of violence.
4. It was further a manner and means of the conspiracy that the defendants and their co-conspirators would supply narcotics to distribution points located throughout the Island of Puerto Rico.
5. It was further a manner and means of the conspiracy that the leaders of the conspiracy would delegate to family members and other close co-conspirators the administration of the

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day-to-day operation of the drug distribution points within Barbosa and Sierra Linda.

6. It was further a manner and means of the conspiracy that defendants and their co-conspirators would purchase wholesale quantities of heroin, cocaine, marijuana, oxycodone (commonly known as "Percocet", and alprazolam (commonly known as "Xanax") in order to distribute the same in user quantity amounts at the distribution points located within Barbosa, Sierra Linda and throughout the Island of Puerto Rico.

7. It was further a manner and means of the conspiracy that the defendants and their co-conspirators would also supply kilogram quantities of narcotics to drug traffickers throughout Puerto Rico, New York, New Jersey, Pennsylvania and Florida.

8. It was further a manner and means of the conspiracy that the defendants and their co-conspirators would "cook" portions of the cocaine purchased at wholesale prices in order to make cocaine base (commonly known as "crack"), which would subsequently be sold in user amounts at the distribution points located within Barbosa, Sierra Linda and throughout the Island of Puerto Rico.

9. It was further a manner and means of the conspiracy that the defendants and their co-conspirators would cut, divide and package heroin, cocaine base (crack), cocaine and marijuana in small "baggies", glass vials, and plastic containers for subsequent sale at the distribution points located within Barbosa, Sierra Linda and throughout the Island of Puerto Rico.

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10. It was further a manner and means of the conspiracy that the defendants and their co-conspirators would create brands of certain narcotics by utilizing distinctive packaging, seals, and/or color-coded stickers in order to keep track, identify, and maintain control of the narcotics distributed at the drug distribution points located within Barbosa, Sierra Linda and throughout the Island of Puerto Rico.

11. It was further a manner and means of the conspiracy that the leaders, drug point owners, or their direct subordinates, would routinely give out "samples" of new batches of heroin or cocaine to users in order to test the "quality" of the drug, and promote the sale of the product.

12. It was further a manner and means of the conspiracy that the defendants and their co-conspirators would routinely possess, carry and use firearms and other dangerous weapons in order to protect themselves from rival organizations and law enforcement authorities, and to punish and discipline subordinate DTO members, and members of the community.

13. It was further a manner and means of the conspiracy that the defendants and their co-conspirators would be responsible for some or all of the following tasks associated with the operation of the DTO: (a) collecting and picking up narcotics and cash proceeds from customers and sellers at Barbosa and Sierra Linda; (b) delivering this money to various storage locations (referred to as "stash houses") utilized by the DTO; (c) counting and packaging the narcotics and cash proceeds; and (d) reporting to the leaders of the DTO on the receivables generated by the sale of the controlled substances.

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14. It was further a manner and means of the conspiracy that the defendants and their co-conspirators would communicate using two-way radio scanners or "walkie talkies". These two-way radios would be used to alert members of the DTO to the presence of law enforcement officers, suspicious vehicles, as well as to communicate amongst members of the DTO regarding the management of the drug points within Barbosa and Sierra Linda.

15. It was further a manner and means of the conspiracy that the defendants and their co-conspirators would place steel or wrought iron gates or doors in stairwells of certain buildings within Barbosa in order to conduct narcotics transactions from behind the barrier, thus creating a significant obstacle for police intervention and investigation, and defining their control over the drug distribution point.

16. It was part of the manner and means of the conspiracy that the defendants and their co-conspirators would purchase the right to own and control drug points within Barbosa and Sierra Linda, either on a permanent or temporary basis.

17. It was further a manner and means of the conspiracy that the defendants and their co-conspirators would attempt to create the appearance that their narcotics proceeds were legitimate by purchasing legitimate assets, including but not limited to real estate properties, race cars, motor vehicles, vessels and businesses through the use of "straw owners" or "jockeys", with the objective of concealing the true ownership of the assets, and the illegal source of the funds used to make the purchases.

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18. It was further a manner and means of the conspiracy that the defendants and their co-conspirators would recruit and hire individuals with qualifying credit ratings to act as "straw owners" for real estate properties, motor vehicles and vessels, used by members of the conspiracy.

19. It was further a manner and means of the conspiracy that the defendants and their co-conspirators would enlist the assistance of a corrupt employee in the finance and insurance department of an automobile dealership, who would allow "straw owners" to purchase vehicles for the use of members of the DTO.

20. It was further a manner and means of the conspiracy that the defendants and their co-conspirators would purchase assets, utilize nominee bank accounts to deposit narcotics proceeds, and make payments for services with cash and money orders, in order to: (a) conceal the true ownership of the assets; (b) conceal the source of the funds; and (c) avoid tracing by financial institutions and civil and criminal authorities, and protect their interest in the properties.

21. It was further a manner and means of the conspiracy that the defendants and their co-conspirators would utilize money pick-ups of large amounts of narcotics proceeds in order to quickly move bulk cash, rather than using traditional financial transactions that would have left a paper trail and triggered financial reporting requirements.

22. It was further a manner and means of the conspiracy that the defendants and their co-conspirators would obtain and introduce narcotics, cellular telephones and other contraband into the Metropolitan Detention Center, a federal detention facility, in Guaynabo, Puerto

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Rico.

23. It was further a manner and means of the conspiracy that the defendants and their co-conspirators would utilize narcotics proceeds to purchase winning tickets from the Puerto Rico Traditional Lottery in order to create the appearance that they had legitimately purchased the winning lottery ticket.

24. It was further a manner and means of the conspiracy that the defendants and their co-conspirators would travel throughout Puerto Rico and to the continental United States in order to purchase race cars and compete in drag race events.

25. It was further a manner and means of the conspiracy that the defendants and their co-conspirators controlled a fully equipped garage/gymnasium/recording studio/office in Bayamon, which acted as a clubhouse for leaders of the DTO.

26. It was further a manner and means of the conspiracy that the defendants and their co-conspirators, from approximately 2003 until the present, would host and fund Christmas concerts held within Barbosa. These concerts would be free of charge for the general public and for residents of Barbosa and Sierra Linda. Renowned Puerto Rican musicians, including numerous Reggaeton, Hip Hop, Rap, Salsa and Merengue artists would perform at these concerts, using professional stages with sophisticated video, audio, and pyrotechnic displays. Proceeds from the sale of illegal narcotics from the DTO would be collected among the defendants and co-conspirators and used to pay all costs associated with the concerts.

27. It was further a manner and means of the conspiracy that the defendants and their co-conspirators would contract professional audio and video technicians to produce recorded

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copies of important events, including but not limited to Christmas concerts and a funeral of a member of the DTO.

28. It was further a manner and means of the conspiracy that the defendants and their co-conspirators did conceal and hide, and cause to be concealed and hidden, the manner and means and acts done in furtherance of the conspiracy, and did use counter-surveillance and other means to avoid detection and apprehension by law enforcement authorities.

ROLES OF THE MEMBERS OF THE CONSPIRACY

(a) Leaders

The leaders directly controlled and supervised the drug trafficking operations at drug distribution points within Barbosa and Sierra Linda, as well as the supply of controlled substances to drug distribution points. During the span of the conspiracy, leaders purchased multi-kilogram quantities of narcotics and oversaw the transportation and sale of such narcotics by their subordinates at the different drug distribution points. During different times of this conspiracy, the leaders would allow members of the conspiracy to carry firearms in order to protect the drug distribution operations. The following co-conspirators acted as leaders in this organization: [1] Angel Ayala Vazquez, aka, "El Negro, El Buster, Angelo Millones Papa Upa", [2] Jose Negron Rivera, aka "Nino Brown", and [3] Omar Medina Santiago, aka "Omar El Gordo".

(b) Suppliers

The suppliers were co-conspirators who would, among other duties, purchase and

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transport wholesale amounts of narcotics and deliver them to the leaders of the DTO for further distribution at the drug distribution points. The following co-conspirators acted as suppliers in this organization: [4] **Samuel Negron Hernandez, aka "Sammy Toston"**, [5] **Elvin Torres Estrada, aka "Muñecon", "Irvin", "Irving"**, [6] **Diego Cardona Vazquez** and [7] **Jose Hernandez Torres, aka "Gringo"**.

(c) Administrators

The administrators were co-conspirators who would, among other duties, supervise the day to day operations of the various narcotics distribution points within Barbosa, Sierra Linda and other locations within Puerto Rico. The following co-conspirators acted as administrators in this organization: [8] **Luis X. Cruz Vazquez, aka "El Mono", "Xadiel", "Xadier"** and [9] **Charlie Martinez Baez**.

(d) Drug Point Owners

The drug point owners would purchase or lease the right to sell certain narcotics at drug points located within Barbosa, Sierra Linda, and other locations within Puerto Rico. These co-conspirators were permitted to operate their drug points within Barbosa, Sierra Linda and throughout the Island of Puerto Rico, only with the permission of the leaders and organizers of the DTO. The following co-conspirators acted as drug point owners in this organization: [10] **Efren Sanchez Peña, aka "Papa"**, [11] **Jose R. Rosario Oquendo, aka "Checo"**, [12] **Felix Chevalier Torres, aka "O'Neil"**, [13] **Ramon J. Rosario Oquendo, aka "Raymond"**, [14] **Hector Carmona Couvertier, aka "Towa"**, [15] **Pedro Juan Diaz, aka "Popo"**, [16] **Orlando Ayala, aka "Negrito"**, [17] **Alexandro Martinez Baez, aka**

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"Alex Prenda, Alex Fuerte", [18] Jose Badillo Lopez, aka "Jayson", [19] Alejandro Santiago Borrero, aka "Manita", [20] Lizbeth Caban Olivo, aka "Tita" and [21] Juanita Rivera, aka "Moña".

(e) **Enforcers**

Enforcers did possess, carry, brandish, use and discharge firearms to protect the leaders and members of the drug trafficking organization ("DTO"), the narcotics, the proceeds derived from their sales, and to further accomplish the goals of the conspiracy. The following co-conspirators acted as enforcers in this organization: [26] Juan Carlos Orsini Martinez, aka "Cano Biombo" and [27] Aramis Nuñez Aybar.

(f) **Runners**

The runners worked under the direct supervision of the leaders of the drug trafficking organization. They were responsible for, among other duties, packaging, decking, and providing sufficient narcotics to the sellers for further distribution at the drug points. They were also responsible for collecting the proceeds of drug sales and paying the street sellers. They would also supervise and make schedules in order to ensure that there were enough street sellers for every shift of the drug points. They would also prepare ledgers to maintain accountability of the sales of the narcotics sold at the drug points. At various times during the conspiracy, they were responsible for recruiting street sellers and additional runners. The runners would also supervise the sellers and the daily activities at the drug point. The following co-conspirators acted as runners in this organization: [22] Jose Ortega Sanchez, aka "Chelin", [23] Carlos Santiago Agosto, aka "Carlito's Way", [24] Luis Pizarro Morales,

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aka "Prieto", [25] Miguel Angel Montes, "Ito", [26] Juan Carlos Orsini Martinez, aka "Cano Biombo" and [27] Aramis Nunez Aybar.

(g) **Sellers**

The sellers would distribute street quantity amounts of heroin, cocaine base, cocaine, marijuana, oxycodone, and alprazolam. They would also be held accountable for the drug proceeds and the narcotics sold at the drug distribution points. The following co-conspirators acted as sellers in this organization: [28] Jerry Garcia Luna, [29] Alexis Cruz Navarro, [30] Jose E. Garcia Gascot, aka "Cuello", [31] Jayson Serrano Andino, aka "Martillo", [32] Jorge Torres Vega, aka "Caneca", [33] Fernando Falcon Lopez, [34] Leonardo Colon, aka "Puchungo", [35] Carlos Torres Pagan, [36] Angel Isaac Rosario Oquendo, [37] Jose Arce Baez, aka "Joey", [38] Julio Martinez Colon, aka "Yuyu", [39] Adal Rivera Lopez, aka "Moises", [40] Anthony Suarez Guzman, [41] Fernando Suarez de Leon, aka "Chucho", [42] Eliut Pedroza Gerena, [43] Angel Olivo Rivera, aka "Tun Tun", [44] Javier Rodriguez Romero, aka "Panki", [45] Ernesto Pedroza Gerena, [46] Jonathan Rivera Romero, aka "Bebo", [47] David Diaz Colon and [48] Angel Santana Altruz, aka "Indio".

(h) **Facilitators**

Facilitators furthered the manner and means of the drug trafficking organization in assisting with the placement, layering and integration of the organization's narcotics proceeds within the legitimate economic and financial systems. They would also serve as assistants for

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the leaders of the organization in different tasks. The following co-conspirators acted as facilitators in this organization: [49] Jorge Luis Torres-Nieves, aka "Georgie Bacalao", [50] Humberto Cruz-Ortiz, aka "Masita", [51] Rafael Santiago Martinez, aka "Pica", [52] Edgar Medina Montalvo, aka "Canito", [53] Alberto Melendez Saez, and [54] Marva Adorno Molina.

(i) Lookouts

The lookouts would be strategically stationed around the perimeters of the Barbosa and Sierra Linda with walkie talkies or other communications devices. Their role was to alert the sellers, runners, and drug point customers of either law enforcement or rival organization intrusion into their watch areas. The following co-conspirators acted as lookouts in this organization: [55] Edwin Vazquez Oliveras, aka "Edwin El Pato", [56] Mayra Ivelise Atanacio Ramos, [57] Jariel Jose Zapata Bonilla, aka "Menor", [58] Wilfredo Rivera Vargas , aka "Monkey", [59] Maribel Olivo Rivera, [60] Jose L. Colon Marrero, aka "Papo El Cojo", [61] Rafael Rivera Rivera, aka "Rafaelito", [62] Erick Suarez Guzman, aka "Herito", [63] Alex David Davila Olivo, aka "Alex Gringo", [64] Joshua Orta Ramos and [65] Angel Soto Olivo, aka "Peewee".

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

Title 21, United States Code, Section 963

(Conspiracy to Import Narcotics into the Customs Territory of the United States)

Beginning in or about February of 2007, and ending in or about February of 2008, in

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the District of Puerto Rico, and within the jurisdiction of this Court,

[1]Angel Ayala Vazquez, aka, "El Negro, El Buster, Angelo Millones Papa Upa",

[2] Jose Negron Rivera, aka "Nino Brown",

[7] Jose Hernandez Torres, aka "Gringo",

the defendants herein, did knowingly and intentionally combine, conspire, confederate and agree together with each other, and with other persons known and unknown to the grand jury, to commit the following offense against the United States: to import into the customs territory of the United States, from places outside thereof, one thousand (1,000) kilograms or more of cocaine, a Schedule II, Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 952(a). All in violation of Title 21, United States Code, Section 963.

COUNT THREE

Title 21, United States Code, Section 841

(Possession with Intent to Distribute Heroin)

From in or about the year 1995, and continuing up to and until the return of the instant Indictment, in the District of Puerto Rico, and within the jurisdiction of this Court,

[1]Angel Ayala Vazquez, aka, "El Negro, El Buster, Angelo Millones, Papa Upa",

[2] Jose Negron Rivera, aka "Nino Brown",

[3] Omar Medina Santiago, aka "Omar El Gordo",

[4] Samuel Negron Hernandez, aka "Sammy Toston",

[5] Elvin Torres Estrada, aka "Muñecon", "Irvin", "Irving",

[6] Diego Cardona Vazquez,

[7] Jose Hernandez Torres, aka "Gringo",

[8] Luis X. Cruz Vazquez, aka "El Mono", "Xadiel", "Xadier",

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- [9] Charlie Martinez Baez,
- [10] Efren Sanchez Peña, aka "Papa",
- [11] Jose R. Rosario Oquendo, aka "Checo",
- [12] Felix Chevalier Torres, aka "O'Neil",
- [13] Ramon J. Rosario Oquendo, aka "Raymond",
- [14] Hector Carmona Couvertier, aka "Towa",
- [15] Pedro Juan Diaz, aka "Popo",
- [16] Orlando Ayala, aka "Negrito",
- [17] Alejandro Martinez Baez, aka "Alex Prenda, Alex Fuerte",
- [18] Jose Badillo Lopez, aka "Jayson",
- [19] Alejandro Santiago Borrero, aka "Manita",
- [20] Lizbeth Caban Olivo, aka "Tita",
- [21] Juanita Rivera, aka "Moña",
- [22] Jose Ortega Sanchez, aka "Chelin",
- [23] Carlos Santiago Agosto, aka "Carlito's Way",
- [24] Luis Pizarro Morales, aka "Prieto",
- [25] Miguel Angel Montes, "Ito",
- [26] Juan Carlos Orsini Martinez, aka "Cano Biombo",
- [27] Aramis Nuñez Aybar,
- [28] Jerry Garcia Luna,
- [29] Alexis Cruz Navarro,
- [30] Jose E. Garcia Gascot, aka "Cuello",
- [31] Jayson Serrano Andino, aka "Martillo",
- [32] Jorge Torres Vega, aka "Caneca",
- [33] Fernando Falcon Lopez,
- [34] Leonardo Colon, aka "Puchungo",
- [35] Carlos Torres Pagan,
- [36] Angel Isaac Rosario Oquendo,
- [37] Jose Arce Baez, aka "Joey",
- [38] Julio Martinez Colon, aka "Yuyu",
- [39] Adal Rivera Lopez, aka "Moises",

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- [40] Anthony Suarez Guzman,
- [41] Fernando Suarez de Leon, aka "Chucho",
- [42] Eliut Pedroza Gerena,
- [43] Angel Olivo Rivera, aka "Tun Tun",
- [44] Javier Rodriguez Romero, aka "Panki",
- [45] Ernesto Pedroza Gerena,
- [46] Jonathan Rivera Romero, aka "Bebo",
- [47] David Diaz Colon,
- [48] Angel Santana Altruz, aka "Indio",
- [55] Edwin Vazquez Oliveras, aka "Edwin El Pato",
- [56] Mayra Ivelise Atanacio Ramos,
- [57] Jariel Jose Zapata Bonilla, aka "Menor",
- [58] Wilfredo Rivera Vargas , aka "Monkey",
- [59] Maribel Olivo Rivera,
- [60] Jose L. Colon Marrero, aka "Papo El Cojo",
- [61] Rafael Rivera Rivera, aka "Rafaelito",
- [62] Erick Suarez Guzman, aka "Herito",
- [63] Alex David Davila Olivo, aka "Alex Gringo",
- [64] Joshua Orta Ramos,
- [65] Angel Soto Olivo, aka "Peewee",

the defendants herein, and others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute one (1) kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Narcotic Drug Controlled Substance, within one thousand (1,000) feet of real property comprising a public or private school and/or housing facility owned by a public housing authority and/or a playground. All in violation of Title 21, United States Code, Sections 841(a)(1) and 860; and Title 18, United States Code, Section 2.

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COUNT FOUR

Title 21, United States Code, Section 841

(Possession with Intent to Distribute Crack Cocaine)

From in or about the year 1995, and continuing up to and until the return of the instant Indictment, in the District of Puerto Rico, and within the jurisdiction of this Court,

[1] Angel Ayala Vazquez, aka, "El Negro, El Buster, Angelo Millones Papa Upa"

[2] Jose Negron Rivera, aka "Nino Brown",

[3] Omar Medina Santiago, aka "Omar El Gordo",

[4] Samuel Negron Hernandez, aka "Sammy Toston",

[5] Elvin Torres Estrada, aka "Muñecon", "Irvin", "Irving",

[6] Diego Cardona Vazquez,

[7] Jose Hernandez Torres, aka "Gringo",

[8] Luis X. Cruz Vazquez, aka "El Mono", "Xadiel", "Xadier",

[9] Charlie Martinez Baez,

[10] Efren Sanchez Peña, aka "Papa",

[11] Jose R. Rosario Oquendo, aka "Checo",

[12] Felix Chevalier Torres, aka "O'Neil",

[13] Ramon J. Rosario Oquendo, aka "Raymond",

[14] Hector Carmona Couvertier, aka "Towa",

[15] Pedro Juan Diaz, aka "Popo",

[16] Orlando Ayala, aka "Negrito",

[17] Alejandro Martinez Baez, aka "Alex Prenda, Alex Fuerte",

[18] Jose Badillo Lopez, aka "Jayson",

[19] Alejandro Santiago Borrero, aka "Manita",

[20] Lizbeth Caban Olivo, aka "Tita",

[21] Juanita Rivera, aka "Moña",

[22] Jose Ortega Sanchez, aka "Chelin",

[23] Carlos Santiago Agosto, aka "Carlito's Way",

[24] Luis Pizarro Morales, aka "Prieto",

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- [25] Miguel Angel Montes, "Ito",
- [26] Juan Carlos Orsini Martinez, aka "Cano Biombo",
- [27] Aramis Nuñez Aybar,
- [28] Jerry Garcia Luna,
- [29] Alexis Cruz Navarro,
- [30] Jose E. Garcia Gascot, aka "Cuello",
- [31] Jayson Serrano Andino, aka "Martillo",
- [32] Jorge Torres Vega, aka "Caneca",
- [33] Fernando Falcon Lopez,
- [34] Leonardo Colon, aka "Puchungo",
- [35] Carlos Torres Pagan,
- [36] Angel Isaac Rosario Oquendo,
- [37] Jose Arce Baez, aka "Joey",
- [38] Julio Martinez Colon, aka "Yuyu",
- [39] Adal Rivera Lopez, aka "Moises",
- [40] Anthony Suarez Guzman,
- [41] Fernando Suarez de Leon, aka "Chucho",
- [42] Eliut Pedroza Gerena,
- [43] Angel Olivo Rivera, aka "Tun Tun",
- [44] Javier Rodriguez Romero, aka "Panki",
- [45] Ernesto Pedroza Gerena,
- [46] Jonathan Rivera Romero, aka "Bebo",
- [47] David Diaz Colon,
- [48] Angel Santana Altruz, aka "Indio",
- [55] Edwin Vazquez Oliveras, aka "Edwin El Pato",
- [56] Mayra Ivelise Atanacio Ramos,
- [57] Jariel Jose Zapata Bonilla, aka "Menor",
- [58] Wilfredo Rivera Vargas , aka "Monkey",
- [59] Maribel Olivo Rivera,
- [60] Jose L. Colon Marrero, aka "Papo El Cojo",
- [61] Rafael Rivera Rivera, aka "Rafaelito",

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[62] Erick Suarez Guzman, aka "Herito",
[63] Alex David Davila Olivo, aka "Alex Gringo",
[64] Joshua Orta Ramos,
[65] Angel Soto Olivo, aka "Peewee",

the defendants herein, and others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute fifty (50) grams or more of a mixture or substance containing a detectable amount of cocaine base, a Schedule II Narcotic Drug Controlled Substance, within one thousand (1,000) feet of real property comprising a public or private school and/or housing facility owned by a public housing authority and/or a playground. All in violation of Title 21, United States Code, Sections 841(a)(1) and 860; and Title 18, United States Code, Section 2.

COUNT FIVE

**Title 21, United States Code, Section 841
(Possession with Intent to Distribute Cocaine)**

From in or about the year 1995, and continuing up to and until the return of the instant Indictment, in the District of Puerto Rico, and within the jurisdiction of this Court,

[1]Angel Ayala Vazquez, aka, "El Negro, El Buster, Angelo Millones Papa Upa",
[2] Jose Negron Rivera, aka "Nino Brown",
[3] Omar Medina Santiago, aka "Omar El Gordo",
[4] Samuel Negron Hernandez, aka "Sammy Toston",
[5] Elvin Torres Estrada, aka "Muñecon", "Irvin", "Irving",
[6] Diego Cardona Vazquez,
[7] Jose Hernandez Torres, aka "Gringo",

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- [8] Luis X. Cruz Vazquez, aka "El Mono", "Xadiel", "Xadier",
- [9] Charlie Martinez Baez,
- [10] Efren Sanchez Peña, aka "Papa",
- [11] Jose R. Rosario Oquendo, aka "Checo",
- [12] Felix Chevalier Torres, aka "O'Neil",
- [13] Ramon J. Rosario Oquendo, aka "Raymond",
- [14] Hector Carmona Couvertier, aka "Towa",
- [15] Pedro Juan Diaz, aka "Popo",
- [16] Orlando Ayala, aka "Negrito",
- [17] Alejandro Martinez Baez, aka "Alex Prenda, Alex Fuerte",
- [18] Jose Badillo Lopez, aka "Jayson",
- [19] Alejandro Santiago Borrero, aka "Manita",
- [20] Lizbeth Caban Olivo, aka "Tita",
- [21] Juanita Rivera, aka "Moña",
- [22] Jose Ortega Sanchez, aka "Chelin",
- [23] Carlos Santiago Agosto, aka "Carlito's Way",
- [24] Luis Pizarro Morales, aka "Prieto",
- [25] Miguel Angel Montes, "Ito",
- [26] Juan Carlos Orsini Martinez, aka "Cano Biombo",
- [27] Aramis Nuñez Aybar,
- [28] Jerry Garcia Luna,
- [29] Alexis Cruz Navarro,
- [30] Jose E. Garcia Gascot, aka "Cuello",
- [31] Jayson Serrano Andino, aka "Martillo",
- [32] Jorge Torres Vega, aka "Caneca",
- [33] Fernando Falcon Lopez,
- [34] Leonardo Colon, aka "Puchungo",
- [35] Carlos Torres Pagan,
- [36] Angel Isaac Rosario Oquendo,
- [37] Jose Arce Baez, aka "Joey",
- [38] Julio Martinez Colon, aka "Yuyu",
- [39] Adal Rivera Lopez, aka "Moises",

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[40]Anthony Suarez Guzman,
[41] Fernando Suarez de Leon, aka "Chucho",
[42] Eliut Pedroza Gerena,
[43] Angel Olivo Rivera, aka "Tun Tun",
[44] Javier Rodriguez Romero, aka "Panki",
[45] Ernesto Pedroza Gerena,
[46] Jonathan Rivera Romero, aka "Bebo",
[47] David Diaz Colon,
[48] Angel Santana Altruz, aka "Indio",
[55] Edwin Vazquez Oliveras, aka "Edwin El Pato",
[56] Mayra Ivelise Atanacio Ramos,
[57] Jariel Jose Zapata Bonilla, aka "Menor",
[58] Wilfredo Rivera Vargas , aka "Monkey",
[59]Maribel Olivo Rivera,
[60] Jose L. Colon Marrero, aka "Papo El Cojo",
[61] Rafael Rivera Rivera, aka "Rafaelito",
[62] Erick Suarez Guzman, aka "Herito",
[63] Alex David Davila Olivo, aka "Alex Gringo",
[64] Joshua Orta Ramos,
[65] Angel Soto Olivo, aka "Peewee",

the defendants herein, and others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance, within one thousand (1,000) feet of real property comprising a public or private school and/or housing facility owned by a public housing authority and/or a playground. All in violation of Title 21, United States Code, Sections 841(a)(1) and 860; and Title 18, United States Code, Section 2.

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COUNT SIX

**Title 21, United States Code, Section 841
(Possession with Intent to Distribute Marijuana)**

From in or about the year 1995, and continuing up to and until the return of the instant Indictment, in the District of Puerto Rico, and within the jurisdiction of this Court,

- [1]Angel Ayala Vazquez, aka, "El Negro, El Buster, Angelo Millones Papa Upa",
 - [2] Jose Negron Rivera, aka "Nino Brown",
 - [3] Omar Medina Santiago, aka "Omar El Gordo",
 - [4] Samuel Negron Hernandez, aka "Sammy Toston",
 - [5] Elvin Torres Estrada, aka "Muñecon", "Irvin", "Irving",
 - [6] Diego Cardona Vazquez,
 - [7] Jose Hernandez Torres, aka "Gringo",
 - [8] Luis X. Cruz Vazquez, aka "El Mono", "Xadiel", "Xadier",
 - [9] Charlie Martinez Baez,
 - [10] Efren Sanchez Peña, aka "Papa",
 - [11] Jose R. Rosario Oquendo, aka "Checo",
 - [12] Felix Chevalier Torres, aka "O'Neil",
 - [13] Ramon J. Rosario Oquendo, aka "Raymond",
 - [14] Hector Carmona Couvertier, aka "Towa",
 - [15] Pedro Juan Diaz, aka "Popo",
 - [16] Orlando Ayala, aka "Negrito",
 - [17] Alejandro Martinez Baez, aka "Alex Prenda, Alex Fuerte",
 - [18] Jose Badillo Lopez, aka "Jayson",
 - [19] Alejandro Santiago Borrero, aka "Manita",
 - [20] Lizbeth Caban Olivo, aka "Tita",
 - [21] Juanita Rivera, aka "Moña",
 - [22] Jose Ortega Sanchez, aka "Chelin",
 - [23] Carlos Santiago Agosto, aka "Carlito's Way",
 - [24] Luis Pizarro Morales, aka "Prieto",

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- [25] Miguel Angel Montes, "Ito",
- [26] Juan Carlos Orsini Martinez, aka "Cano Biombo",
- [27] Aramis Nunez Aybar,
- [28] Jerry Garcia Luna,
- [29] Alexis Cruz Navarro,
- [30] Jose E. Garcia Gascot, aka "Cuello",
- [31] Jayson Serrano Andino, aka "Martillo",
- [32] Jorge Torres Vega, aka "Caneca",
- [33] Fernando Falcon Lopez,
- [34] Leonardo Colon, aka "Puchungo",
- [35] Carlos Torres Pagan,
- [36] Angel Isaac Rosario Oquendo,
- [37] Jose Arce Baez, aka "Joey",
- [38] Julio Martinez Colon, aka "Yuyu",
- [39] Adal Rivera Lopez, aka "Moises",
- [40] Anthony Suarez Guzman,
- [41] Fernando Suarez de Leon, aka "Chucho",
- [42] Eliut Pedroza Gerena,
- [43] Angel Olivo Rivera, aka "Tun Tun",
- [44] Javier Rodriguez Romero, aka "Panki",
- [45] Ernesto Pedroza Gerena,
- [46] Jonathan Rivera Romero, aka "Bebo",
- [47] David Diaz Colon,
- [48] Angel Santana Altruz, aka "Indio",
- [55] Edwin Vazquez Oliveras, aka "Edwin El Pato",
- [56] Mayra Ivelise Atanacio Ramos,
- [57] Jariel Jose Zapata Bonilla, aka "Menor",
- [58] Wilfredo Rivera Vargas , aka "Monkey",
- [59] Maribel Olivo Rivera,
- [60] Jose L. Colon Marrero, aka "Papo El Cojo",
- [61] Rafael Rivera Rivera, aka "Rafaelito",

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[62] **Erick Suarez Guzman, aka "Herito",**
[63] **Alex David Davila Olivo, aka "Alex Gringo",**
[64] **Joshua Orta Ramos,**
[65] **Angel Soto Olivo, aka "Peewee",**

the defendants herein, and others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute one thousand (1000) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, within one thousand (1,000) feet of real property comprising a public or private school and/or housing facility owned by a public housing authority and/or a playground. All in violation of Title 21, United States Code, Sections 841(a)(1) and 860; and Title 18, United States Code, Section 2.

**COUNT SEVEN
(Forfeiture Allegation)**

1. The allegations contained in Counts One through Six of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 982(a)(1), 982(a)(2) and 853.

2. Upon conviction of one or more of the controlled substance offenses alleged in Counts One through Six of this Indictment, each defendant so convicted shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 841, 846, 960 , 963 and 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said violations and any property used, or intended to be used, in any manner or

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part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

A. Money Judgement

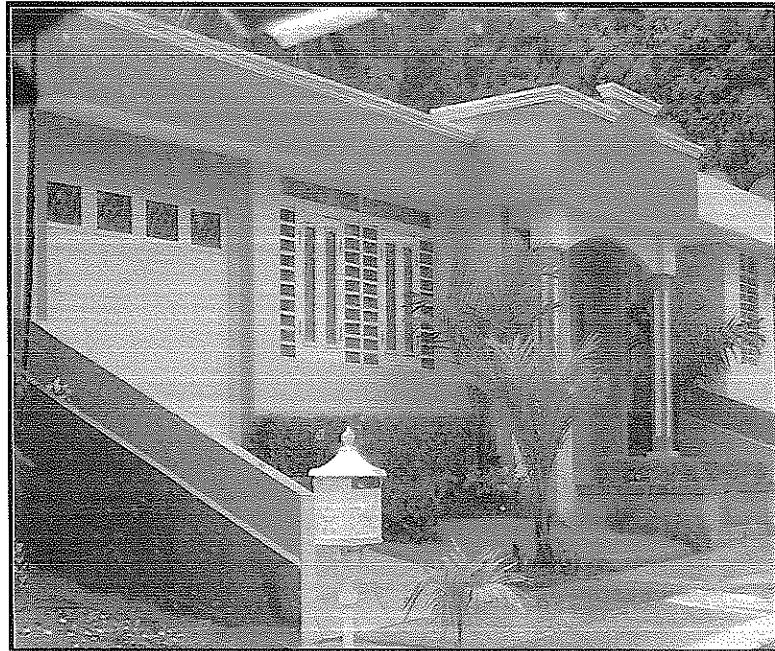
A sum of money of at least ONE HUNDRED MILLION DOLLARS (\$100,000,000.00) in United States currency, representing the amount of proceeds obtained as a result of the offense charged in Count One, that is, Title 21, United States Code, Section 846, for which any so convicted defendants are jointly and severally liable.

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), each defendant shall forfeit substitute property, up to the value of the amount described in paragraph two (2), if, by any act or omission of the defendant, the property described in paragraph two (2), or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, including but not limited to:

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- a. One urban Lot, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Barrio Candelariq, Toa Baja, Puerto Rico, more particularly described as:

URBANA: Solar marcado con el #20 del bloque "H" de la Urbanización El Plantío localizada en el Barrio Candelario del Municipio de Toa Baja, Puerto Rico, con un área superficial de 322.65 metros cuadrados, en lindes por el: NORTE, con el solar #21-H en una distancia de 27.00 metros; SUR, con el solar #19-H, en una distancia de 27.00 metros; ESTE, con la calle 1-D, en una distancia de 11.95 metros; OESTE, con el solar #11-H, en una distancia de 11.95 metros. Enclava: Una casa de concreto para fines residenciales. FINCA #20,338, inscrita al folio 255 del tomo 341 de Toa Baja, Inscripción Ira. (Registro de la Propiedad, Sección Segunda de Bayamón, Puerto Rico).



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- b. One urban Lot, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Barrio Mucarabones, Toa Alta, Puerto Rico, more particularly described as:

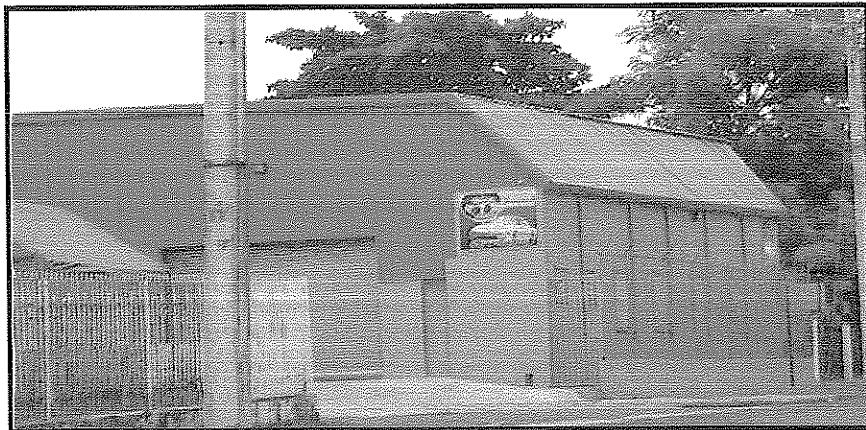
URBANA: Solar radicado en la Urbanización Brisas de Montecasino, en el Barrio Mucarabones del Municipio de Toa Alta, Puerto Rico, marcado con el solar J-8, área de 350.00 metros cuadrados. En lindes por el NORTE, con la calle #10 a 14.00 metros cuadrados; por el SUR, con solar 11-J en 14.00 metros, por el ESTE, con solar J-9 en 25.00 metros; y por el OESTE, con solar 7-5 en 25.00 metros. FINCA #23,485, inscrita al folio 64 del tomo 464 de Toa Alta, inscripción 2da (Registro de la Propiedad, Sección Tercera de BAYAMÓN, Puerto Rico).



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- c. One urban Lot, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Barrio Pájaros, Bayamón, Puerto Rico, more particularly described as:

URBANA: Lote de terreno o solar marcado con el #2 del bloque P de la Urbanización Santa Catalina, radicada en el Barrio Pájaros del término municipal de Bayamón, Puerto Rico, con una cabida de 522.62 metros cuadrados. Colinda por el NORTE, en 25.00 metros con el solar 1-P; por el SUR, en 7.96 metros con la Carretera Estatal 861; por el OESTE, en una curva de 25.69 metros y una distancia de 8.06 metros con la calle 11; y por el ESTE, en 21.79 metros con el solar 3-P. FINCA # 60,478, inscrita al folio 156 del tomo 1348 de Bayamón Sur, inscripción Ira (Registro de la Propiedad, Sección Primera de Bayamón, Puerto Rico).



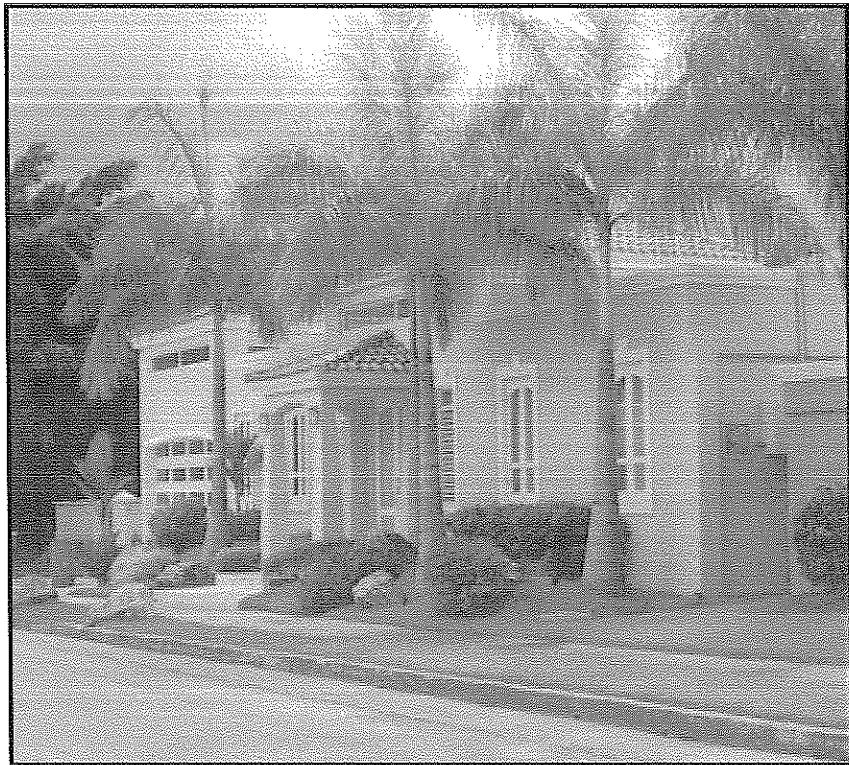
- d. One urban Lot, with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Bo. Almirante Carr. 155Km. 3.0., Barrio Algarrobo, Vega Baja, Puerto Rico, described as Alessam Gas Station.



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- e. One urban Lot, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Barrio Piña, Toa Alta, Puerto Rico, more particularly described as:

URBANA: Solar No. 372 de la Urbanización Ciudad Jardín II, Cuarta Etapa, localizado en el Barrio Piña del Municipio de Toa Alta, Puerto Rico con una cabida superficial de 876.01 metros cuadrados. En lindes por el NORTE, en distancia de 25.00 metros, con el solar No. 371; por el SUR, en una distancia de 21.174 metros, con terrenos dedicados para Parque; por el Este, en tres alineaciones distintas una juna distancia de 15.905 metros, en un arco de longitud de 11.156 metros y en otro acro de longitud de 23.085 metros, con la Calle No. 7 (Casia) de dicha Urbanización; y por el OESTE, en distancia de 39.194 metros, con los solares Nos. 357 y 358, todos estos solares pertenecientes al referido desarrollo urbano. Contiene una casa de concreto diseñada para una sola familia. FINCA # 19,289, inscrita al folio 56 del tomo 384 de Toa Alta, Bayamón. (Registro de la Propiedad, Sección Tercera de Bayamón, Puerto Rico).



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- f. One Urban Lot, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Barrio Ortiz y Piñas, Toa Alta, Puerto Rico, more particularly described as:

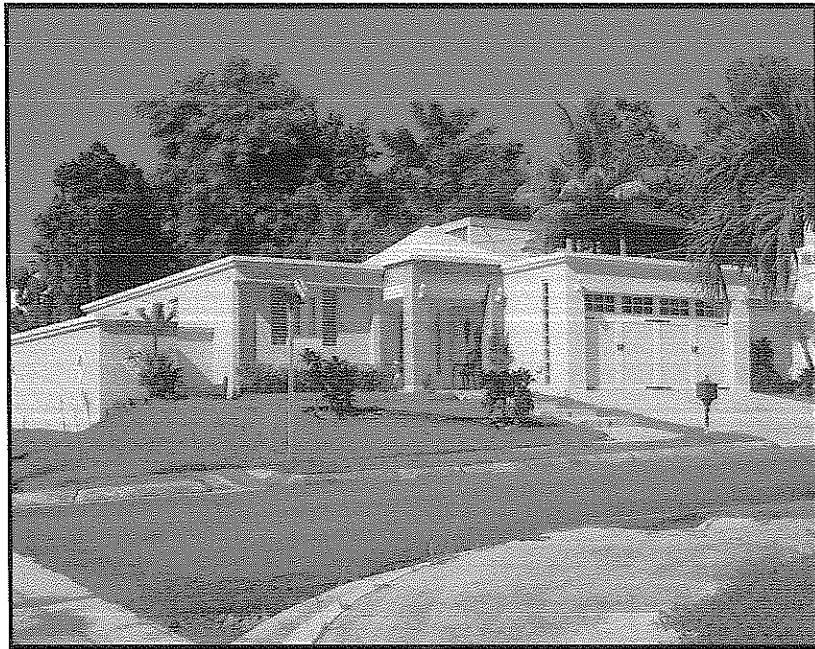
URBANA: Solar radicado en la Urbanización "Palacios del Río II, localizado en los Barrios Ortiz y Piñas del Municipio de Toa Alta, Puerto Rico, que se describe en el plano de inscripción de la Urbanización con el número, área y colindancias que se relacionan a continuación: Solar No. 18 del Bloque "H". Área de 1,213.62 metros cuadrados. En lindes por el NORTE, con el solar No. 19 del Bloque "H" y con la Sucesión Andrés Rodríguez, en dos alineaciones, en una distancia de 52.007 metros y en otra distancia de 25.891 metros; por el SUR, con el solar No. 17 del Bloque "H", en una distancia de 60.430 metros; por el ESTE, con la Calle No. 2, en una distancia de 10.707 metros; y por el OESTE, con la Sucesión Andrés Rodríguez, en dos alineaciones, en una distancia de 9.901 metros y en otra distancia de 1.742 metros. Enclava una vivienda de bloques y hormigón reforzado para una familia. FINCA # 25,016, inscrita al folio 182 del tomo 494 de Toa Alta. (Registro de la Propiedad, Sección Tercera de Bayamón, Puerto Rico).



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- g. One urban Lot, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Barrio Hato Teas, Bayamón, Puerto Rico, more particularly described as:

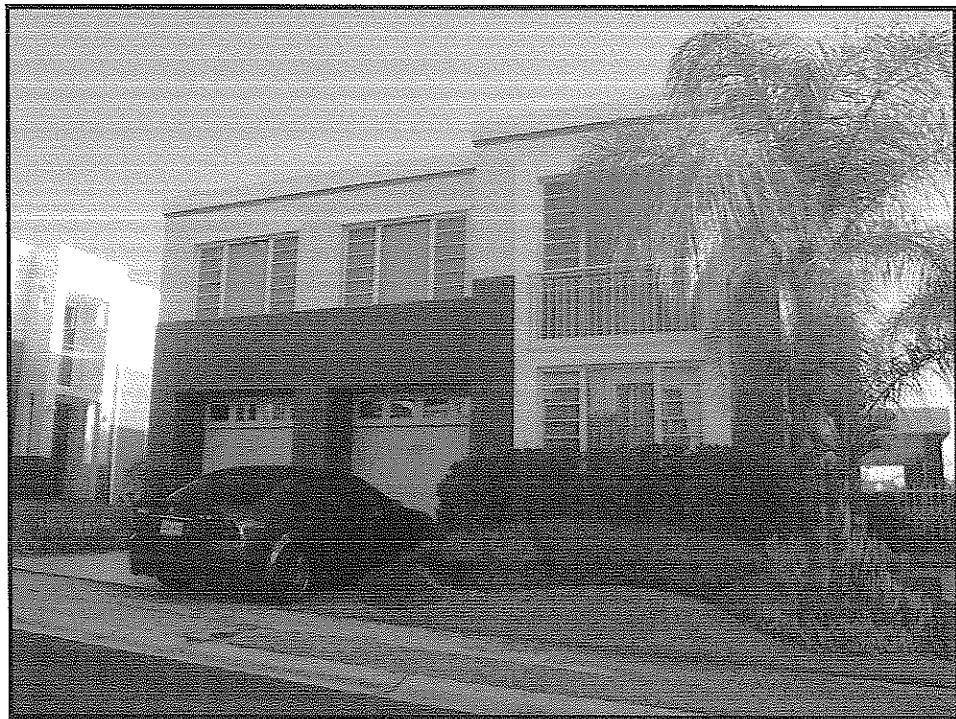
URBANA: Parcela de terreno identificada a como lote No. AA-9 en el plano de inscripción de la Urbanización San Rafael Estates, localizado en la Calle Margarita de dicha Urbanización, Barrio Hato Tejas, Municipio de Bayamón, Puerto Rico, cuenta la parcela en cuestión con una cabida superficial de 828.423 metros cuadrados. En lindes por el NORTE, en 18.50 metros lineales, con el lote No. AA-7 y el lote No. AA-8; por el SUR, en 14.23 metros lineales, con el lote NO. AA-10 y un arco de 18.89 metros lineales, con la Calle Azucena; por el ESTE, en 18.50 metros lineales, con la Calle Margarita; por el OESTE, en 25.69 metros lineales, de otro, con remanente. En el solar en cuestión esta enclavada una estructura de hormigón y bloque la misma consta sección tres cuartos dormitorios, dos baños, sala, comedor y marquesina para dos autos. El solar en cuestión esta afectado por una servidumbre de paso a favor de la Puerto Rico Telephone Company, tiene un ancho de 1.50 metros lineales, por todo el frente de Calle y otra servidumbre de paso pluvial de 3.00 metros a todo lo largo de la colindancia Sur. En adición el solar en cuestión tiene un área de talud aproximada de 42.59 metros cuadrados a lo largo de la colindancia. FINCA # 72,596, inscrita al folio 166 del tomo 1736 de Bayamón Sur. (Registro de la Propiedad, Sección Primera, Bayamón, Puerto Rico).



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- h. One urban Lot, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Barrio Cañabón, Caguas, Puerto Rico, more particularly described as:

URBANA: Parcela de terreno identificada como solar No. 142 del Bloque "LE" de la Urbanización La Estancia, radicado en el Barrio Cañabón del término municipal de Caguas, Puerto Rico, con una cabida de 500.65 metros cuadrados. En lindes por el NORTE, en 17.31 metros, con los solares Nos. 158 y 159; por el SUR, en 17.30 metros, con la Calle Vía Pintada (Calle No. 2); por el ESTE, en 11.70 metros, 3.20 metros y 16.97 metros, con el solar No. 141; y por el OESTE, en 11.70 metros, 3.20 metros y 17.52 metros, con el solar No. 143. Contiene una casa de concreto diseñada para una familia. FINCA # 56,898, inscrita al folio 143 de tomo 1684 de Caguas, Puerto Rico. (Registro de la Propiedad, Sección Primera de Caguas, Puerto Rico).



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Criminal No. 09-173 (PG)

- i. One urban Lot, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Urb. Toa Linda, Boque A #6, more particularly described as:

URBANA, Solar marcado con el #6 del bloque A en el plano de inscripcion de la Urbanizacion Toa Linda, radicado en el Barrión Piñas del termino municipal de Toa Alta, con cabida superficial de 377.00 metros cuadrados. En lindes por el NORTE, con carretera estatal #861 en 13.00 metros; por el SUR con la calle A en 13.00 metros; por el ESTE con solar #7 en 29.00 metros; y por el OESTE con el solar #5 en 29.00 metros. FINCA # 12128, inscrita al Folio 174 del Tomo 249 de Toa Alta, inscripcion 1a (Seccion III de Bayamon).



Superseding Indictment
Criminal No. 09-173 (PG)

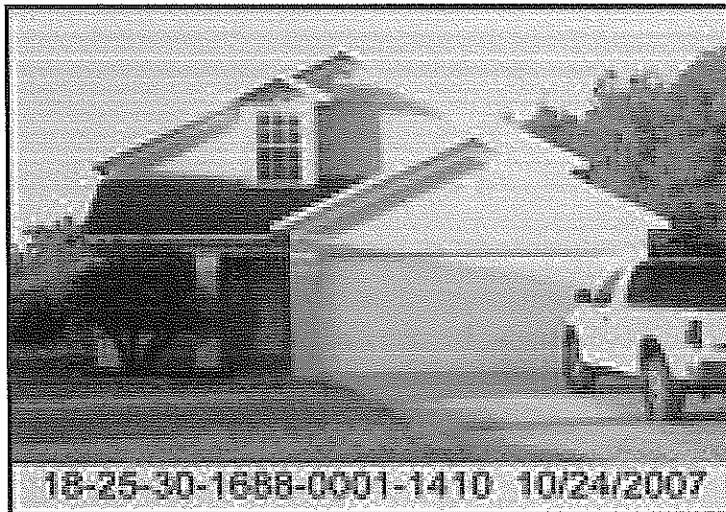
- j. One urban Lot, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Urb. Terrazas del Toa#17, Bloque 3H, Toa Alta, Puerto Rico, more particularly described as:

FINCA 14,446, inscrita al Tomo 295 al folio 96.



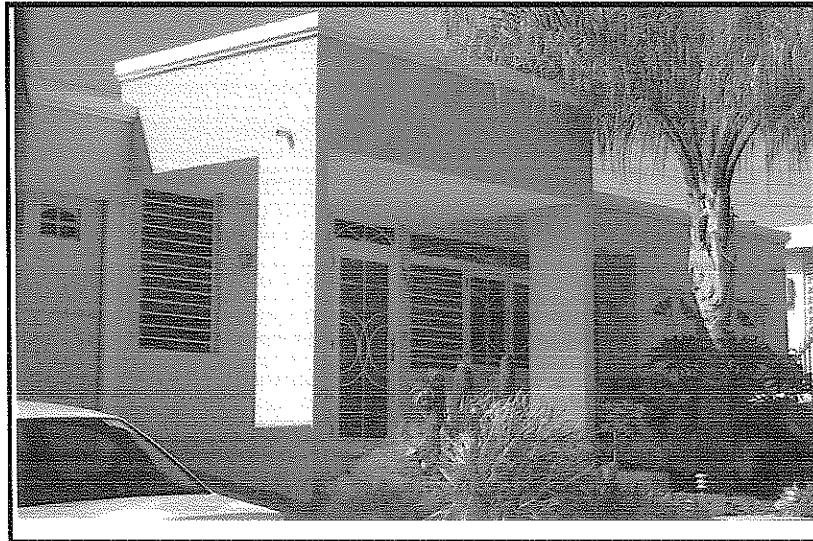
- k. One urban Lot, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 2216 Jessa Drive, Kissimmee, Florida, more particularly described as:

Lot 141, MARISOL Phase 2, according to the map or plat thereof, as recorded in Plat Book 10, at pages 127-192, of the Public Records of Osceola County, Florida.

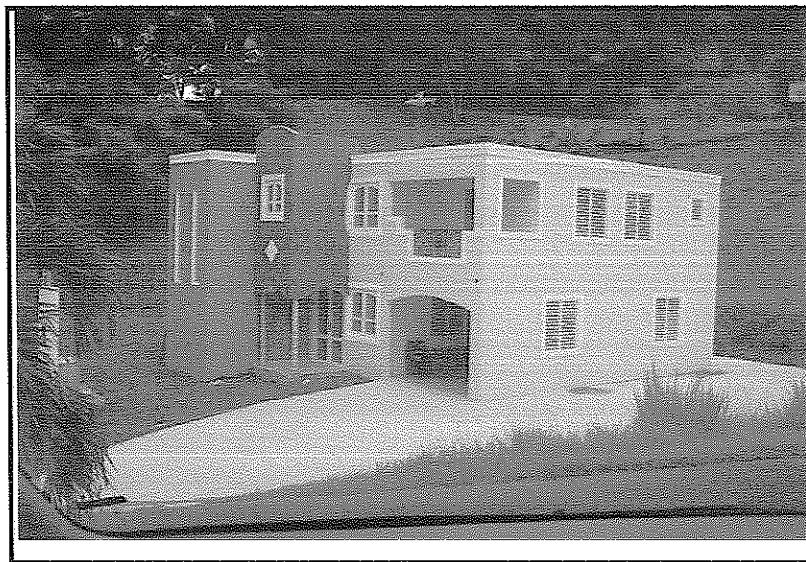


*Superseding Indictment
Criminal No. 09-173 (PG)*

1. One Urban Lot, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Colinas de Bayoan, Calle Caunabo, #103, Bayamon, Puerto Rico.



- m. One Lot, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Carr.826 final, Camino del Centro , Sector Espinal, Bo. Guadiana Abajo, Near Hacienda Juan Narvaez, Naranjito, Puerto Rico.

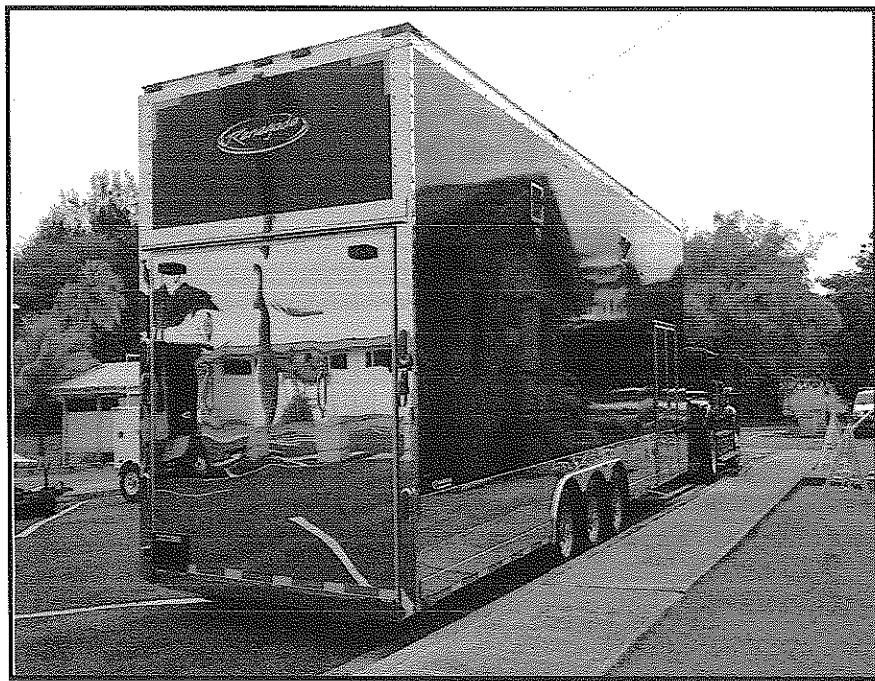


Superseding Indictment
Criminal No. 09-173 (PG)

- n. 2008 International Truck, Model RXT 4200, black in color, VIN 3HRSUSKMX8N678145, Puerto Rico license plate number H-50791.

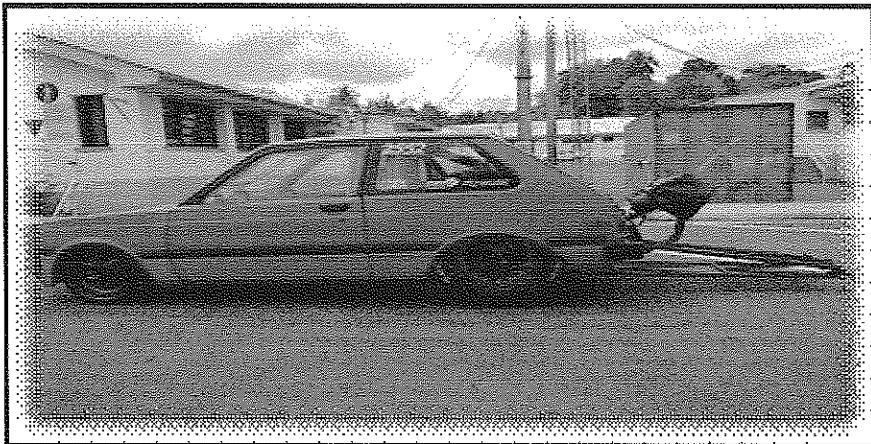


- o. 2008 Renegade Trailer, black in color, VIN 1K9500P3981160039, Puerto Rico license plate number 111659A.

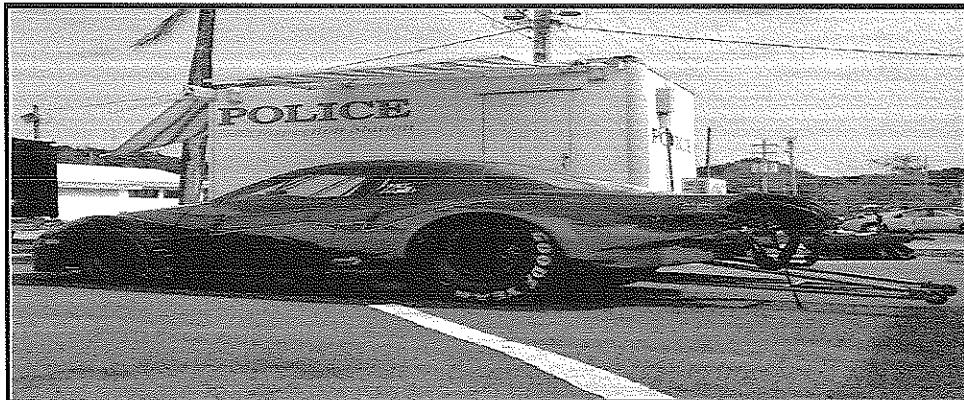


*Superseding Indictment
Criminal No. 09-173 (PG)*

- p. 1981 Toyota Starlet, 3/4 chassis, drag race car, red in color, VIN JT2KP61G5B5561263, named "ADRIANA IS BACK".



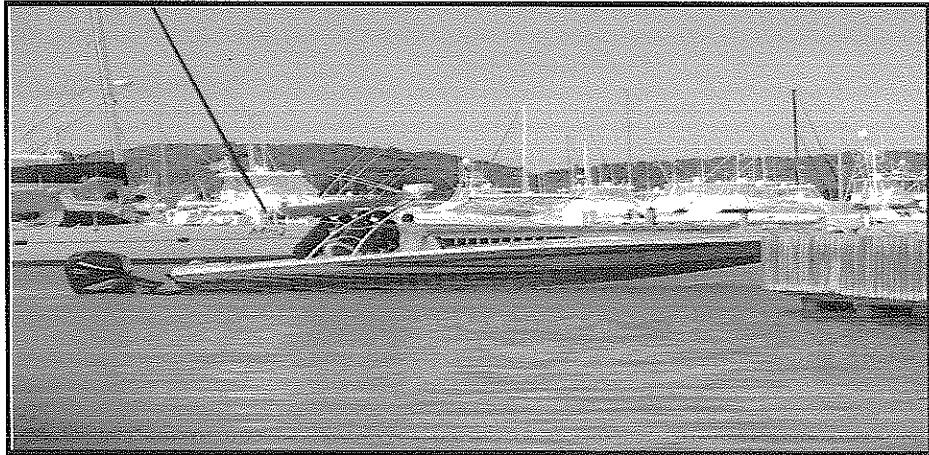
- q. Custom made MAZDA RX8, full chassis, drag race car, black, purple, red and blue in color, named "MAJOR LEAGUE".



- r. 1982 Toyota Starlet, 3/4 chassis, drag race car, red, silver, blue and green in color, named "LA ATREVIDA".
- s. 1982 Toyota Starlet, 3/4 chassis, drag race car, blue in color, named "ANAGELIE".
- t. Continental vessel trailer bearing Puerto Rico License 107229A, VIN 12JBA35378M051328.
- u. Assorted tools seized from warehouse in Valencia, Hto Teas, Bayamon, Puerto Rico valued at Forty Thousand Four Hundred and Five dollars and sixty eight cents (\$40, 405.68).

***Superseding Indictment
Criminal No. 09-173 (PG)***

- v. 2008 33' Avanti power boat, with 3 outboard motors (275 horsepower each), white, red and black in color, registration number PR-5344-AC, and hull number AVV33056F708, named "LA NENA".



- w. 2006 38' Donzi power boat, with inboard motors, yellow, orange and black in color, registration number PR-5918-AC, and hull number DNAZB014E506, named "EL SUNAMI".
- x. 1996 Mack CL 713, blue in color, VIN 1M2AD62C2TW004213.
- y. 1997 Mack CL 713, green in color, VIN 1M2AD62C7VW004551.
- z. 1989 Mack Truck, gold in color, VIN 1M2AT40Y9KM004114.
- aa. 1994 Mack Truck, light green in color, VIN 1M2AD09C4RW001518.
- bb. 1997 Mack Truck, light green in color, VIN 1M2P270Y5VM030078.
- cc. 1997 Summit Dump Trailer, VIN 1S8SD2621V0009567.
- dd. 1997 Summit Dump Trailer, VIN 1S8SD2623V0009568.
- ee. 1995 Kenworth Truck, red in color, 1NK0LBEX1SS671224.
- ff. 1990 Steco Trailer, VIN 1S9DSF2T4L1252440.
- gg. 1996 Summit Dump Trailer, VIN 1S8AD2827G0006197.
- hh. 1996 Mack Truck, VIN 1M2P270Y3VM030080.
- ii. 1996 Summit Dump Trailer, VIN 1S8AD2836T0009255.
- jj. Doral Bank account number 340034123.
- kk. Doral Bank account number 300277373.
- ll. Santander Bank account number 4007267199.
- mm. 2009 Mack Series B, Puerto Rico License Plate H44932, VIN 1M2P267C11M058703.

Superseding Indictment
Criminal No. 09-173 (PG)

- nn. 2009 Mack Series B, Puerto Rico License plate H44908, VIN 1M2P267C71M058057.
- oo. 2009 Mack Series B, Puerto Rico License plate H44933, VIN 1M2P267C31M058699.
- pp. Honda Accord, Puerto Rico License Plate CSA-528, purple/blue in color, VIN 1HGCD5629RA168171.
- qq. Ford F-250, Puerto Rico license plate 857-828, white in color, VIN 1FTNF20F6YEA52218.
- rr. Mazda 6, Puerto Rico license plate HKH-334, white in color, VIN 1YVHP82A195M10870.
- ss. Ford Equinox, Puerto Rico license plate GIR-781, grey in color, VIN 2CNDL13F556190113.
- tt. White Trailer, Car Mate, Trailer ID # 5A3C824D48L002107.
- uu. Black Golf Cart located at Reparto Valencia C/Rosa A-26, Bayamon, Puerto Rico.
- vv. Mazda RX-7, Puerto Rico license plate HFT-309, gray in color.
- ww. Mazda RX-7, gray in color, named "EL SAMMY".
- xx. All furniture, located and seized at Reparto Valencia C/Rosa A-26, Bayamon, Puerto Rico.
- yy. All music and recording equipment located and seized at Reparto Valencia C/Rosa A-26, Bayamon, Puerto Rico.
- zz. All gym equipment located and seized at Reparto Valencia C/Rosa A-26, Bayamon, Puerto Rico.
- aaa. 2001 Jeep Wrangler, Puerto Rico license plate EEK-653, green in color.
- bbb. Red Lamborghini Motorcycle, Puerto Rico license plate 194533.
- ccc. Blue Rhino ATV, Model 660 Special Edition.
- ddd. Red Club Golf Cart located at 750 Los Dominicos Avenue, Miraflores, Bayamon, Puerto Rico.
- eee. Silver Yamaha Golf Cart, Model 616, at 750 Los Dominicos Avenue, Miraflores, Bayamon, Puerto Rico.
- fff. Toyota Tundra, Puerto Rico license plate 814-575.
- ggg. Mazda RX7, Puerto Rico license plate DIX-224, VIN JM1FD3316P0201044.
- hhh. BMW 335, Puerto Rico license plate HFQ-548, VIN WBAVB73598VH24722.
- iii. Mercedes Benz, C 63, VIN WDDGF77X28F160632.

Superseding Indictment
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- jjj. Honda CRV, Puerto Rico license plate HBK-496, VIN
JHLRE38797C050368.
- kkk. Acura MDX, Puerto Rico license plate HAC-284, VIN
2HNYD28437H523345.
- lll. Honda Accord, Puerto Rico license plate GSG-784.
- mmm. Honda Ridgeline, Puerto Rico license plate 830-305, VIN
2HJYK16507H5334.

All in accordance with Title 18, United States Code, Section 982(a)(1) and Rule 32.2(a)
of the Federal Rules of Criminal Procedure.

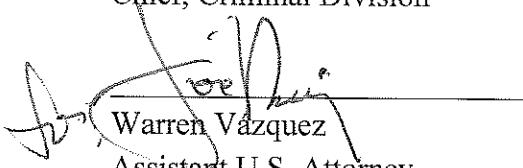
TRUE BILL

FOREPERSON

Date: Sept 28 2009

ROSA EMILIA RODRIGUEZ-VÉLEZ
United States Attorney


José Ruiz-Santiago
Assistant U.S. Attorney
Chief, Criminal Division


Warren Vázquez
Assistant U.S. Attorney
Unit Chief, Violent Crimes Division


Olga B. Castellón
Assistant United States Attorney


Timothy R. Henwood
Assistant U.S. Attorney